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MEMO ENDORSED

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March 19, 2008

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VIA FACSIMILE

Honorable Frank Maas
United States Magistrate Judge
United States District Court for the Southern District of New York
500 Pearl Street, Room 740
New York, NY 10007

*Counsel should place a conference
call to Chambers by March 24
to arrange a new date for an
in-court conference.*
F. Maas, USMJ,
3/19/08

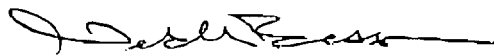
Re: Fei v. West LB AG, 07 Civ. 8785 (HB)

Dear Judge Maas:

We represent Defendant and Counterclaim Plaintiff WestLB AG ("WestLB"). We write to advise Your Honor that WestLB will be responding to Plaintiff Fei's counsel's March 18, 2008 letter to the Court, and also will be raising a number of what we believe to be serious discovery deficiencies by Plaintiff Fei. As we have just learned today that Plaintiff Fei's counsel may not be producing Plaintiff Fei for deposition, our letter to your Honor awaits our attempting to first resolve this new discovery issue with Plaintiff Fei's counsel.

By letter from Your Honor's Chambers dated March 11, 2008, a telephone conference has been scheduled in this matter for April 9, 2008. Because of the number of discovery disputes and what we believe to be the severity of Plaintiff Fei's discovery deficiencies (which we will be setting forth in our letter), we respectfully request that the telephone conference be changed to an in person conference before your Honor. In all events, we hereby request an adjournment and rescheduling because of a conflict that we have on April 9, 2008.

Respectfully Submitted,



Ned H. Bassen

cc: Honorable Harold Baer, Jr.
Jack Raisner, Esq.
Linda Neilan, Esq.
Tara Lai Quinlan, Esq.

